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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PCPLV LLC d/b/a Pinnacle Compounding
Pharmacy, OFIR VENTURA, CECELIA
VENTURA, BRANDON JIMENEZ,
ROBERT GOMEZ, GOMEZ &
ASSOCIATES, INC., ROCK'N ROB
ENTERPRISES, AMIR SHALEV, D.P.M.,
AS ENTERPRISES, INC., AND IVAN
LEE GOLDSMITH, M.D.,

Defendants.

Case No. 2:21-cv-00184-JCM-DJA

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT
BRANDON JIMENEZ TO FILE A
RESPONSIVE PLEADING**

(First Request)

Plaintiff UNITED STATES OF AMERICA and Defendant BRANDON JIMENEZ ("Defendant"), through counsel, hereby stipulate and jointly move the Court to extend the time for Defendant to file an answer or other responsive pleading to Plaintiff's complaint by an additional 60 days. This is the first request to extend this deadline and is based on the following:

1. On February 2, 2021, the United States filed its Complaint. ECF No. 1.

2. Contemporaneously herewith, Defendant executed a Waiver of Service of Summons.

3. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(ii), an answer or responsive pleading under Rule 12 is due within 60 days after the request for waiver was sent.

4. Defendant's answer or other responsive pleading is currently due November 27, 2023.


5. Since the Complaint was filed, the United States and Defendant have engaged in meaningful settlement discussions, including a mediation. The parties desire to continue the discussions to determine whether a resolution can be reached.

6. Accordingly, the parties request that the Court extend the time for Defendant to answer or otherwise plead by 60 days. Defendant's responsive pleading would then be filed on or before January 26, 2024, which is 60 days from the current responsive pleading deadline.

Respectfully submitted this ^{9/29/2023} day of September, 2023.

JASON M. FRIERSON
United States Attorney

CLARK HILL PLC

BY: 
SUMMER A. JOHNSON
Assistant United States Attorney

BY: 
MICHAEL CRISTALLI, ESQ.
Attorney for Defendant BRANDON JIMENEZ

Having reviewed the parties' joint motion, the Court finds that it contains certain deficiencies. First, the parties erroneously filed it as a stipulation, instead of as a joint motion as required by Local Rule 7-1(c). Second, the parties have not included a signature block as required by Local Rule IA 6-2. Nonetheless, the Court finds good cause to grant the joint motion.

IT IS THEREFORE ORDERED that the parties' joint motion to extend (ECF No. 25) is GRANTED.
IT IS FURTHER ORDERED that future filings must carefully comply with the Local Rules.


DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE
DATED: October 3, 2023